REMARKS

The Applicant has been carefully reviewed in light of the Office Action mailed June 5, 2007. At the time of the Office Action, Claims 1-25 are pending in this patent application. Claims 1-25 are rejected. Claims 1 is amended. Reconsideration and allowance of all pending claims is respectfully requested in view of the following remarks.

Rejection under 35 U.S.C. 102

Claims 1-5, 8-10, 14-16 and 20-25 are rejected under 35 U.S.C. 102(e) as being anticipated by *Lyles* et al. (U.S. Patent Application No. 2005/0125482 hereinafter "*Lyles*"). The system and method of *Lyles* is directed toward making telecommunication equipment assignments via a graphical user interface. *Lyles* does not teach or suggest a system and method for automatically updating the layout of a telecommunication network, or a system and method for displaying load balance activity as claimed.

In particular, Claim 1 as amended includes "a maintenance entry component for receiving maintenance information that equipment has been added or removed from a physical layout of a telecommunications network" and "a structural database component that automatically updates the physical layout database of the network to reflect equipment has been added or removed from the physical layout of the telecommunications network." Applicants respectfully submit that *Lyles* fails to teach or suggest these features. *Lyles* describes providing a graphical user interface that allows a user to create a form to request that various changes be made to a network element. The request form is described by Lyles as a "5939 Form" which can be submitted to a corporate-communication group. (*Lyles*, paragraph [0058]).

Thus, *Lyles* describes allowing a user to request changes to be made to a network element. *Lyles* does not teach or suggest receiving maintenance information indicating that equipment has been added or removed from a telecommunication network. Further *Lyles* does not teach automatically updating a physical layout database of the network to reflect that the equipment has been added or removed from the physical layout of the telecommunication network.

6

Regarding Claims 2-3, the cited portions of *Lyles* (paragraphs [0066] and [0074]) describe a graphical user interface that includes a "Hub Info" screen and a "Hub Assignment" screen. However, there is no teaching or suggestion in the cited portions of *Lyles* of a "line unit" much less wherein the maintenance information includes lines that have been added to or removed from a particular line unit as claimed.

Regarding Claim 4, the cited portion of *Lyles* (paragraphs [0060] and [0063]) describe that the graphical user interface may be used to retrieve information about an AI 180 switch. However, there is no teaching or suggestion that information in a physical layout database may be utilized to generate line usage reports as claimed.

With regard to Claim 8, Applicants respectfully submit that *Lyles* fails to teach or suggest "receiving maintenance information that equipment has been added or removed from a physical layout of a telecommunications network" and "automatically updating a physical layout database of the network to reflect that equipment has been added or removed from the physical layout of the telecommunications network" for similar reasons as those discussed with respect to Claim 1. For similar reasons as those discussed with respect to Claim 4, Applicants respectfully submit that *Lyles* also fails to teach or suggest the feature of Claim 8 of "such that information in the physical layout database may be utilized to generate line usage reports."

Similar arguments as specified above are asserted with respect to Claims 9, 15, 21, 24, and 25.
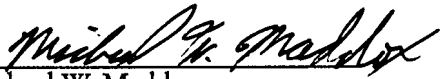
Rejection under 35 U.S.C. 103

Claims 5-7, 11-13, and 17-19 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Lyles*, et al. in view of *Mehra* et al. (U.S. Patent No. 7,089,583 hereinafter "Mehra"). *Mehra* specifies that "BDK provides the ability to track the history of all changes to an object, including the date of a change, the identity of the user making the change, and a justification for the change." (*Mehra*, col. 21, lines 52-55) *Mehra* does not specify that the changes are maintenance information as claimed by Applicants in Claims 5-7 and 11-13. Further, neither *Mehra* nor *Lyles* discloses generating or displaying line usage information or a line usage report as claimed in Claims 8 and 15.

In view of the above amendment, applicant believes the pending application is in condition for allowance.

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Respectfully submitted,

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8